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10 Attorneys for Defendant
11 SALVADOR ORTIZ-PADILLA

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 vs.
18 SALVADOR ORTIZ-PADILLA,
19 Defendant.

20 Case No. 1:21-cr-00239-JLT-SKO
21 STIPULATION TO CONTINUE CHANGE OF
22 PLEA HEARING; ORDER

23 IT IS HEREBY STIPULATED, by and between the parties through their respective
24 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant
25 Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the change of plea
26 hearing currently scheduled for February 20, 2024, may be continued to April 1, 2024, at 9:00
27 a.m.

28 The parties have been in active plea negotiations regarding a resolution in this case, and
29 the government has extended a plea agreement in this matter. Counsel for Mr. Ortiz-Padilla has
30 discussed this plea agreement with Mr. Ortiz-Padilla. Following these discussions, Mr. Ortiz-
31 Padilla has found it necessary to consult with an immigration attorney in order to more fully
32 understand the impact of any plea in this case. Mr. Ortiz-Padilla has now met with an
33 immigration attorney and is in the process of obtaining the answers to his questions. At present,
34 he requires additional time and opportunity to continue to meet with this attorney and to work

1 with this attorney on issues related to his immigration status. Accordingly, the parties are
2 requesting to continue the February 20, 2024 change of plea hearing to April 1, 2024, to provide
3 sufficient time for these continued discussions.

4 The requested continuance is made with the intention of conserving time and resources
5 for both the parties and the Court. The government is in agreement with this request and the
6 requested date is a mutually agreeable date for both parties. The parties stipulate that for the
7 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the
8 date of this order through April 1, 2024, for defense preparation and investigation, pursuant to 18
9 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice served by resetting
10 the change of plea hearing outweigh the best interest of the public and the defendant in a speedy
11 trial.

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Respectfully submitted,

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HEATHER E. WILLIAMS
Federal Defender

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Date: February 15, 2024

/s/ Reed Grantham _____
REED GRANTHAM
Assistant Federal Defender
Attorney for Defendant
SALVADOR ORTIZ-PADILLA

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PHILLIP A. TALBERT
United States Attorney

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Date: February 15, 2024

/s/ Justin Gilio _____
JUSTIN GILIO
Assistant United States Attorney
Attorney for Plaintiff

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ORDER

IT IS SO ORDERED. The change of plea hearing currently set for February 20, 2024, is hereby continued to April 1, 2024, at 9:00 a.m.

The time through April 1, 2024, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: February 16, 2024

Jennifer L. Thurston
UNITED STATES DISTRICT JUDGE